

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

**THE PARTIES' JOINT MOTION FOR EXTENSION OF JURY TRIAL DATE**

Plaintiff William Riley-El, through his attorney, Gabrielle Sigel, Jenner & Block, LLP, and Defendants, through their attorney, Colleen Shannon, Assistant Illinois Attorney General, respectfully move for a sixty-day extension of the jury trial date set in this case, currently scheduled for the week of June 14, 2021. In support of this motion, the parties state as follows:

1. Plaintiff's counsel was appointed by this Court on February 16, 2021. Since that date, due to COVID-19 restrictions and the procedures imposed by Stateville Correctional Center, Plaintiff's counsel represents that she has only been able to schedule two telephone visits, for a total consulting time of less than 50 minutes.

2. On April 14, 2021, Plaintiff's counsel represents that she was granted the ability to schedule several legal visits in advance, by either telephone or Zoom video call, starting on April 22, but is allowed no more than one visit per week and for no more than 25 minutes (telephone) or 45 minutes (video) per visit. As of April 14, 2021, Plaintiff's counsel was told that no arrangements had yet been made to allow for in-person attorney visits, even for cases scheduled for trial in federal court.

3. After the Court's ruling on summary judgment, Plaintiff's complaint for trial raises issues concerning three separate disciplinary events, and the facts surrounding those events and subsequent conduct by the remaining defendants. Those disciplinary events apparently reference previous lawsuits and disciplinary actions, and a series of facts regarding Plaintiff's allegations of retaliation. Plaintiff's counsel requests the opportunity to become fully informed of the facts surrounding her client's claims and alleged damages.

4. Because of the limits that have been placed on counsel's ability to meet with her client, Plaintiff's counsel respectfully requests additional time to prepare for trial. Specifically, Plaintiff's counsel requests that the trial date, and associated filing of pre-trial materials, be extended for at least 60 days, so that trial is set for no earlier than the week of August 16, 2021.

5. Defendants' counsel joins in this request for an extension of the trial date, including due to the recent disruption to the electronic networks in the Illinois Attorney General's offices.

Respectfully submitted,

By: /s/ Gabrielle Sigel  
Gabrielle Sigel  
Jenner & Block LLP  
353 N. Clark Street  
Chicago, IL 60654  
312-923-2758  
gsigel@jenner.com  
Attorney for Plaintiff

/s/ Colleen M. Shannon (by consent)  
Colleen M. Shannon  
Assistant Attorney General  
100 West Randolph Street, 13th Floor  
Chicago, Illinois 60601  
(312) 814-4451  
colleen.shannon@illinois.gov  
Attorney for Defendants

**CERTIFICATE OF SERVICE**

The undersigned, Gabrielle Sigel, counsel for Plaintiff, certifies that on April 20, 2021, the foregoing document was electronically filed with the Clerk of the Court for the United States District Court for the Northern District of Illinois using the CM/ECF system, and a copy was served on counsel for Defendants, using the email address: [colleen.shannon@illinois.gov](mailto:colleen.shannon@illinois.gov).

/s/ Gabrielle Sigel \_\_\_\_\_